



August 10, 2012

**VIA ECF**

Hon. Tonianne J. Bongiovanni, U.S.M.J.  
U.S. District Court for the District of New Jersey  
Clarkson S. Fisher Building & U.S. Courthouse  
402 East State Street  
Trenton, New Jersey 08608

**Re: *Takeda Pharmaceutical Co. Ltd., et al. v. Zydus Pharmaceuticals USA Inc., et al.*,  
Civil Action No. 3:10-cv-01723-JAP-TJB**

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Dear Judge Bongiovanni:

We, along with our co-counsel Hogan Lovells US LLP, represent Plaintiffs in this matter. We write on behalf of all parties to request that the Court enter the following pre-trial schedule in this action:

McCarter & English, LLP  
Four Gateway Center  
100 Mulberry Street  
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Service of rebuttal expert reports: August 31, 2012.  
Completion of expert discovery: September 21, 2012.  
Opening pre-trial motions filed by: October 5, 2012.  
Opposition to pre-trial motions filed by: October 16, 2012.  
Hearing on pretrial motions: at the court's convenience the week of  
October 22, 2012.

As Your Honor is aware, the trial is scheduled for the week of November 5, 2012. The parties believe that the proposed schedule provides for sufficient time for completion of expert discovery and for filing and briefing of pre-trial motions.

If these dates meet with Your Honor's approval, we respectfully request that you "So Order" this letter and have it entered on the docket. The parties are available to discuss this proposed schedule at the Court's convenience.

Respectfully submitted,

*s/John E. Flaherty*

John E. Flaherty

cc: Counsel of Record (via email)

SO ORDERED on this \_\_\_\_ day of August, 2012:

\_\_\_\_\_  
Hon. Tonianne J. Bongiovanni, U.S.M.J.

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